

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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June 12, 2025

**BY ECF**

Hon. Dale E. Ho  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Application **GRANTED**. Mr. White is permitted to travel to Pennsylvania between June 16, 2025, and June 18, 2025. Mr. White shall provide Pretrial Services with the travel details and the address he will be staying at. The Clerk of Court is respectfully requested to close ECF No. 59.

**SO ORDERED.**

Dated: June 12, 2025  
New York, New York



Dale E. Ho  
United States District Judge

**Re: United States v. Christopher White  
24 Cr. 300 (DEH)**

Dear Judge Ho:

I write, as counsel to Christopher White in the above-captioned matter, to respectfully request a temporary modification of Mr. White's bail conditions to allow him to travel to and stay overnight in Pennsylvania from Monday, June 16 through Thursday, June 18 to attend his fiancé's grandmother's funeral and burial in Pennsylvania. Pretrial Services consents to this request. The government does not object to this request.

Mr. White was originally charged in Bronx state court on May 19, 2023. He was then charged in federal court for the same conduct on September 21, 2023; the state case was not dismissed. Following a contested detention hearing in federal court, the following conditions were set:

\$25,000 personal recognizance bond to be co-signed by one financially responsible person and one individual with moral suasion over Mr. White (specifically, Delilah Santos, his girlfriend); compliance with Pretrial Services supervision as directed; curfew set at the discretion of Pretrial Services; electronic monitoring technology as directed by Pretrial Services; no possession of any firearm, destructive device, or other weapons; surrender all travel documents with no new applications; travel restricted to the Southern District of New York, the Eastern District of New York, the District of New Jersey, and for court purposes only, the Eastern District of PA.

Mr. White was to be released on his own signature and the signature of Delilah Santos, with the remaining conditions to be met by October 5, 2023.

On November 2, 2023, the government withdrew Mr. White's case from the grand jury and dismissed the federal complaint without prejudice. On May 14, 2024, he was rearrested after a federal grand jury returned an indictment. Mr. White was presented in Magistrate Court and released on the same conditions that had been previously set in federal court.

Mr. White has now been on some form of pretrial release—state and/or federal—for two years. During this time, Mr. White has remained in consistent compliance with the conditions of his release as confirmed by Pretrial Services. He has not been rearrested and he has not posed a danger to the community. He has made all of his appearances in state and federal court, including his most recent appearance before Your Honor on March 7, when he took responsibility for his actions. In August 2024, Pretrial Services consented to Mr. White’s request to remove the bail condition imposing a curfew enforced by electronic monitoring, expressing its belief that the curfew condition is unnecessary to ensure Mr. White’s continued appearance in court and the safety of the community. ECF No. 22. The Court denied this request. ECF No. 25. On May 14, 2025, Mr. White moved to replace the bail condition imposing a curfew with standalone location monitoring and expand his travel permissions to the Eastern District of Pennsylvania. ECF No. 51. Pretrial Services consented to this request; the government objected. ECF No. 53. The Court denied this request. ECF No. 54.

The Court has consistently granted Mr. White’s requests to spend the night in New Jersey and Pennsylvania, at times over the objections of Pretrial Services and the government. *See, e.g.*, ECF Nos. 31 (granting permission to spend Thanksgiving weekend with his siblings in New Jersey); 38 (granting permission to travel and stay overnight in Philadelphia and to stay overnight in New Jersey for family events on two separate occasions); 40 (granting permission to stay overnight at his sister’s home in New Jersey); 50 (granting permission to travel to and stay overnight in Pennsylvania for Mother’s Day weekend and to visit fiancé’s grandmother in the hospital); 52 (granting permission to travel to and stay overnight in Pennsylvania for family event); 56 (granting permission to travel and stay overnight in Pennsylvania to visit fiancé’s grandmother in the hospital); 58 (same). Each time, Mr. White has complied with the express conditions of the temporary bail modification without incident.

Accordingly, Mr. White respectfully requests a temporary modification of his bail conditions to allow him to travel to and stay overnight in Pennsylvania from Monday, June 16 through Thursday, June 18 to attend his fiancé’s grandmother’s funeral and burial in Pennsylvania. The government does not object to this request. Pretrial Services consents to this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Marne L. Lenox, Esq.

*Counsel for Christopher White*

cc: Counsel of record